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October 22, 2024

By ECF

The Honorable Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
BroderickNYSDCchambers@nysd.uscourts.gov

Re: In re Application of the New York Times Co. in the Matter of United States of America v. Christopher Wade, 24 Misc. 45 (VSB)

Dear Judge Broderick:

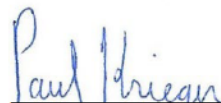
We represent Mr. Christopher Wade in the above-captioned matter. We write regarding the Court's Order filed on October 15, 2024 (the "Order") for Mr. Wade to submit a letter, *ex parte* and under seal, setting forth his position as to the continued sealing of docket entries in his criminal matter. We respectfully request a brief adjournment of the deadline for this letter from October 24, 2024 to November 7, 2024. This two-week adjournment is Mr. Wade's first request for an extension of time related to this submission.

The reasons for this adjournment request are threefold. First, the Court's Order although dated October 9, 2024, Dkt. No. 12, was only filed and received by counsel on October 15, 2024; i.e., six days after the Court signed the Order. Second, earlier this evening, we received from the government a draft reconstructed docket and associated documents, and we require additional time to review and consider our position on the continued sealing of these additional records. Third, Mr. Wade is traveling through early November, and we need additional time to confer with our client to formulate our response to the Order.

We have conferred with the government, and it takes no position as to this request. We appreciate the Court's time and consideration. We are, of course, available to answer any questions Your Honor may have.

Respectfully submitted,
KRIEGER LEWIN LLP

By:



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